



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

January 9, 2007

Joshua A. Creem
General Counsel
Corillian Corporation
3400 NW John Olsen Place
Hillsboro, OR 97124

RE: Memorandum dated December 18, 2006 re: Estimated Schedule to Complete RCRA Corrective Action Activities
Former CEE Associates/InteliData Facility, 80 Pickett District Rd., New Milford, CT, CTD044121697

Dear Mr. Creem:

Thank you for submitting the Estimated Schedule to Complete RCRA Corrective Action Activities, dated December 18, 2006 ("the schedule"). The schedule addresses the following three RCRA Corrective Action activities:

- Documentation of achievement of the Migration of Contaminated Groundwater Under Control Environmental Indicator (EI);
- Equivalency demonstration for clean closure of the former RCRA disposal units (lagoon, sludge drying beds, and associated piping); and
- Demonstration of compliance of other Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). (Note: The schedule does not appear to specify the regulations or policies relative to which compliance will be assessed).

The schedule proposes timeframes for completion of these activities. Generally, these timeframes appear to be acceptable.

The schedule also provides brief descriptions of the Corrective Action activities that are the subject of the memorandum. These descriptions appear to be abbreviated and/or otherwise different from the applicable guidance, regulations, policy, and the activities that had been previously negotiated or discussed for the former InteliData facility (via meetings and correspondence). Please recognize that the determinations of the EI status, the clean closure equivalency, and the compliance of the other SWMUs and AOCs will be made in accordance with appropriate U.S. EPA and Connecticut State guidance, regulations, and policy.

Thank you for your efforts to address environmental concerns at the former IntelliData facility. Please keep EPA and Connecticut Department of Environmental Protection informed of the status of work on the above activities.

Sincerely,


Stephanie Carr
RCRA Facility Manager

cc: B. Drake, ERM
K. King, ERM
T. Quillen, TechLaw Inc.
G. Shteynberg, DEP